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May 17, 2006

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: D.T.E. 06-33 -- Funding Enhanced 911 Services

Dear Ms. Cottrell:

Enclosed for filing is an original and three copies of Verizon Massachusetts' Petition to Intervene.

Thank you for your assistance in this matter.

Very truly yours,

Barbara Anne Sousa

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cc: Tina Chin, Esquire, Hearing Officer

COMMONWEALTH OF MASACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications) and Energy on its own motion to develop a long term plan) for funding Enhanced 911 services)

D.T.E. 06-33

VERIZON MASSACHUSETTS' PETITION TO INTERVENE

Pursuant to 220 C.M.R.1.03(1) of the Rules of Practice and Procedure of the Department of Telecommunications and Energy ("Department"), Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon MA"), hereby petitions the Department for leave to intervene as a party in this proceeding. As grounds for its Petition, Verizon MA states as follows:

- 1. Verizon MA is a common carrier offering intraLATA telecommunications services, including exchange and exchange access services, in the Commonwealth of Massachusetts. Verizon's business address is 185 Franklin Street, Boston, Massachusetts 02110.
- 2. In its *Vote and Order to Open Investigation*, issued on April 28, 2006, the Department opened this investigation pursuant to the Legislature's mandate in the Acts of 2002, c. 239, § 3 that the Department develop a long-term plan for funding wireline Enhanced 911 ("E911") services and submit its recommendation to the Legislature no later than December 31, 2006. *Order* at 2-3.

"identify and address any and all issues affecting the E911 system, including the equitable payment of the costs of the system by all its beneficiaries and the changed and

The scope of this proceeding is broadly defined by the Department to

projected changes in technology comprising the E911 system." Id. at 3. Accordingly,

Verizon MA is substantially and specifically affected by the proceeding. Verizon MA's

interests cannot be adequately represented without the Department granting this petition.

4. Verizon MA intends to participate fully in the case and will, as necessary,

submit written comments, present testimony, conduct discovery, cross-examine witness,

and/or file briefs to protect its interests.

3.

WHEREFORE, Verizon MA requests leave to intervene in the proceeding with

all the rights of participation as a full party.

Respectfully submitted,

VERIZON MASSACHUSETTS

Its Attorneys,

Alexander W. Moore

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Dated: May 17, 2006